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February 6, 2018

Via Certified Mail - Return Receipt Requested
Managing Agent
Total Terminals International, LLC
401 Alaskan Way S
Seattle, WA 98104

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Puget Soundkeeper Alliance (Soundkeeper), 130 Nickerson St., #107, Seattle, WA 98109, (206) 297-7002. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Soundkeeper's intent to file a citizen suit against Total Terminals International, LLC ("TTI") under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by TTI's National Pollution Discharge Elimination System ("NPDES") permit.

TTI was granted coverage on January 1, 2010 under the Washington Industrial Stormwater General Permit ("IGSP") issued by the Washington State Department of Ecology ("Ecology") on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and set to expire on January 1, 2015, under NPDES Permit No. WAR-000465 (the "2010 Permit"). Ecology granted subsequent coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019 (the "2015 Permit") and maintains the same permit number, WAR-000465.

TTI has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and the terms and conditions of the 2010 Permit and 2015 Permit (collectively, "Permits") with respect to operations of, and discharges of stormwater and pollutants from its facility located at or about 401 Alaskan Way S, Seattle, Washington (the "facility") as described herein, to Elliot Bay, part of the Puget Sound. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by TTI.

I. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits require that TTI's discharges not cause or contribute to an excursion of Washington State water quality standards.

TTI discharges to Elliot Bay. TTI discharges stormwater that contains elevated levels of turbidity, copper, and zinc, as indicated in the table of benchmark excursions below. These discharges cause and/or contribute to violations of water quality standards for aquatic life uses, shellfish harvest, recreational uses including primary contact, and miscellaneous uses including wildlife habitat, harvesting, commerce and navigation, boating, and aesthetic values in Elliot Bay and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. *See* WAC 173-201A-610, WAC 173-201A-612. Precipitation data from that time period is appended to this notice of intent to sue and identifies these days.

Table 1: Benchmark Exceedances- bold values indicate exceedances

Quarter in which sample collected and monitoring location	Turbidity (Benchmark 25 NTU)	Cu Concentration (Benchmark 14 ug/L)	Zn Concentration (Benchmark 117 ug/L)
1st Quarter 2012			
4290*	**76**	**89**	**1400**
4320*	**33**	**33**	**720**
4358*	**39**	**19**	**360**
4495*	**350**	**81**	**1750**
2nd Quarter 2012			
4290	**63.2**	**16.4**	**275**
4320			**190**
4358		**15.1**	**200**
4th Quarter 2012			
1*	**254**	**63**	**810**
2*		**16**	**120**

3*	**128**	**33**	**560**
1st Quarter 2013			
1	**87**	**39**	**480**
2			**180**
3		**21**	**340**
2nd Quarter 2013			
1	**66**	**23**	**350**
2			
3	**31.8**	**24**	**470**
3rd Quarter 2013			
1		**27.9**	**340**
2	**118.8**	**29.45**	**530**
3		**16.8**	**300**
4th Quarter 2013			
1	**38.5**	**20**	**310**
2	**279**	**47**	**1040**
1st Quarter 2014			
1	**43.6**	**16**	**310**
2	**72.2**	**15**	**270**
2nd Quarter 2014			
1		**16**	**190**
2	**26.2**	**17**	**400**
3rd Quarter 2014			
2	**37.55**	**25.5**	**295**
4th Quarter 2014			
1			**160**
2	**28.4**		**220**
1st Quarter 2015			
1	**33.5**	**17**	**340**
2			**190**
2nd Quarter 2015			
4*		**141**	**1710**
3rd Quarter 2015			
2	**227**	**60**	**720**
4	**52.8**	**40**	**600**
4th Quarter 2015			
2			**185**
4	**106**	**41**	**500**
1st Quarter 2016			
1	**45.9**		**280**
2	**29.35**		**205**
4	**147**	46	**620**
2nd Quarter 2016			
1			**170**
2			**135**
4		**22.9**	**200**

3rd Quarter 2016			
1		**16**	**250**
2		**18.6**	**261.5**
4	**53.25**	**49.75**	**620**
4th Quarter 2016			
1			**176**
2			**216**
4		**18.4**	**279**
1st Quarter 2017			
1	**25.5**		**236.5**
2	**58**	**20.8**	**310**
4	**106**	**41.9**	**514**
2nd Quarter 2017			
1	**28**	**14.6**	**194**
2	**44**	**18.6**	**242**

* 4290, 4320, 4358, 4495, 1, 2, 3, and 4 are TTI designations for its monitoring points

B. Compliance with Standards.

Condition S10.C of the Permits requires TTI to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparation and implementation of an adequate SWPPP and best management practices ("BMPs"). This failure includes, but is not limited to, failure to install effective treatment BMPs and failure to adequately maintain those BMPs. TTI has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in the table above and as described below in this notice of intent to sue.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the permits. TTI has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this notice of intent to sue.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

TTI is in violation of the Permits' SWPPP provisions as follows:

1. Condition S3.A.1 of the Permits requires TTI to develop and implement a SWPPP as specified. Condition S3.A.2 of the Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, TTI has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

2. Condition S3.A of the Permits requires TTI to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, TTI has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented and has not been updated as necessary.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits require that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A.3 of the Permits require that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. This includes the Stormwater Management Manual for the Western District of Washington, available at http://www.ecy.wa.gov/programs/wq/stormwater/manual/2014SWMMWW interactive/2014%20SWMMWW.htm and the Washington State Marine Terminal AKART and ISGP Corrective Action Guidance Manual, available at http://52.33.28.53:8004/programs/wq/stormwater/industrial/2014Dec.WAStateMarineTerminalCorrectiveActionGuideManual.WPPA.pdf. TTI's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy. For example, TTI's SWPPP does not include adequate maintenance BMPs for its "Up-Flo" System.

4. TTI's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours and seasonal variations in business hours or in industrial activities as required.

5. TTI's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. TTI's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas

associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. TTI's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

8. TTI's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

9. Condition S3.B.4 of the 2010 Permit required that permittees include in their SWPPPs and implement certain mandatory BMPs no later than July 1, 2010 unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. Condition S3.B.4 of the 2015 Permit also requires that permittees include in their SWPPPs and implement mandatory BMPs subject to the same conditions. TTI is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

10. TTI's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be

conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how TTI will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

11. TTI's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

12. TTI's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. TTI's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

13. TTI's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

14. TTI's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations; documents why each discharge point is not sampled; identifies each sampling point by its unique identifying number; identifies staff responsible for conducting stormwater sampling; specifies procedures for sampling collection and handling; specifies procedures for sending samples to the a laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits requires TTI to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require TTI to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

TTI violated these requirements by failing to collect stormwater samples at any of its discharge points during the third quarter of 2017.

TTI has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site. These violations include but are not limited to failure to collect samples from discharge points located on the over-water portion of the facility during each and every calendar quarter for the last five years. These violations have occurred and continue to occur each and every quarter during the last five years that TTI was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not each, point of discharge. These violations will continue until TTI commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits requires TTI to analyze stormwater samples collected quarterly for turbidity, pH, total copper, and total zinc.

TTI violated these conditions by failing to analyze stormwater samples for the second quarter of 2015 from sampling point 1 for turbidity, pH, total copper, and total zinc.

C. Failure to Timely Submit Discharge Monitoring Reports.

Condition S9.A of the Permits requires TTI to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. TTI has violated these conditions by failing to submit a DMR within the time prescribed for the first quarter of 2013 and the second quarter of 2015.

D. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that monthly visual inspection be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that TTI record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is

either in compliance or out of compliance with the SWPPP and the Permits, a summary report and schedule of implementation of the remedial actions that TTI plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

TTI is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements.

Condition S8.B of the Permits requires TTI take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires TTI: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.4 of the Permits require TTI implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 of the Permits establishes the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; and total zinc 117 µg/L.

TTI has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2013, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above.

B. Violations of the Level Two Requirements.

Condition S8.C of the Permits requires TTI take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires TTI: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Two Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C.4 of the Permits require TTI implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establish the benchmarks applicable to TTI described in section IV.A of this notice of intent to sue letter.

TTI has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, including additional structural source control BMPs, and the required summarization in the annual report each time since January 1, 2013, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, TTI's failure to fulfill these obligations for: turbidity triggered by its stormwater sampling during calendar years 2013, 2014, 2015, 2016, and 2017; copper triggered by its stormwater sampling during calendar years 2013, 2014, 2015, 2016, and 2017; and zinc triggered by its stormwater sampling during calendar years 2013, 2014, 2015, 2016, and 2017.

C. Violations of the Level Three Requirements.

Condition S8.D of the Permits requires TTI take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year.

As described by Condition S8.D of the Permits, a Level Three Corrective Action requires TTI: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Three Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or it new/additional treatment BMPs will be installed. Condition S8.D.2.b of the Permits require that a licensed professional engineer, geologist,

hydrogeologist, of certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the Permits requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, the TTI submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the Permits requires TTI fully implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establish the benchmarks applicable to TTI described in section IV.A of this notice of intent to sue letter.

TTI has violated the requirements of the Permits described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including: the required review, revision and certification of the SWPPP, including for example, additional operational and/or structural source control BMPs for the proper performance and maintenance of the "Up-Flo" System; the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment; the required implementation of additional BMPs, including additional treatment BMPs; the required submission of an engineering report, plans, specifications, and an operations and maintenance plan; and the required summarization in the annual report each time since January 1, 2012 its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, TTI's failure to fulfill these obligations for: copper triggered by its stormwater sampling during calendar year 2016; and zinc triggered by its stormwater sampling during calendar year 2016. TTI originally triggered a Level Three Corrective Action in calendar year 2010. Ultimately, TTI received an extension of time to June 30, 2015 for compliance with the Permits' Level Three Corrective Action requirements via administrative order from Ecology (Order #8864, subsequently modified by Order #10637).

V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits requires TTI to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B – D of the Permits. If a corrective action is not yet completed at the time of submission of the annual report, TTI must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2,

or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date TTI expects to complete corrective actions.

TTI has violated this condition. The annual report submitted by TTI for the calendar year 2013 (in May 2014) does not include the required information. Specifically, the report does not describe all of the stormwater problems identified. The annual report submitted by TTI for the calendar year 2014 (in May 2015) does not include the required information. Specifically, the report does not describe any of the stormwater problems identified, and the description of TTI's planned Level 3 corrective action is inadequate. The annual report submitted by TTI for the calendar year 2015 (in May 2016) does not include the required information. Specifically, the report does not describe all of the stormwater problems identified. The annual report submitted for the calendar year 2016 (in May 2017) does not include the required information. Specifically, the report does not describe all of the stormwater problems identified. The report also does not adequately describe the Level 3 corrective action taken during this year or planned for calendar year 2017.

VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permits requires TTI record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if TTI collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why TTI could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, TTI is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the Permits requires TTI to retain for a minimum of five years a copy of the current Permit, a copy of TTI's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. Upon information and belief, TTI is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VIII. FAILURE TO REPORT PERMIT VIOLATIONS.

Condition S9.E of the Permits requires TTI to take certain actions in the event TTI is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment, or exceed any numeric effluent limitation in the permit. In such circumstances, TTI must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and TTI must immediately notify the appropriate Ecology regional office of the failure to comply. TTI must then submit a detailed written report to Ecology, including specified details, within 5 days of the time TTI became aware of the circumstances unless Ecology requests an earlier submission.

On information and belief, TTI routinely violates these requirements, including each and every time TTI failed to comply with the corrective action requirements described in section IV of this Notice of Intent to Sue, and each and every time TTI discharged stormwater with concentrations of pollutants in excess of the Permits benchmarks, as described in Table 1, above. All these violations may endanger human health or the environment.

IX. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit, Soundkeeper hereby requests that TTI provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should TTI fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

X. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Soundkeeper. These violations are ongoing. Soundkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day for each violation that occurred through November 2, 2015, and $52,414 per day for each violation that occurred thereafter. In addition to civil penalties, Soundkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Soundkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly

thereafter, to file a citizen suit against TTI under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: _____
Alyssa Englebrecht
Knoll Lowney

cc: Scott Pruitt Administrator, U.S. EPA
Chris Hladick, Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology
Fairchild Record Search, Ltd., Registered Agent (3400 Capitol Blvd SE, Tumwater, WA 98501)
Michael Dunning, Perkins Coie LLP (1201 3rd Avenue, Suite 4900, Seattle, WA 98101)

Precipitation Data

2013	Precip. (in)	26	0.01	18	0
Feb	sum	27	0.32	19	0.37
6	0.08	28	0.25	20	0.72
7	0.09	2013	Precip. (in)	21	0.1
8	0	Mar	sum	22	0.01
9	0.01	1	0.04	23	0
10	0	2	0.21	24	0
11	0.01	3	0	25	0
12	0	4	0	26	0
13	0	5	0	27	0.01
14	0.03	6	0.61	28	0.06
15	0	7	0.26	29	0.01
16	0	8	0	30	0
17	0	9	0	31	0
18	0	10	0.01	2013	Precip. (in)
19	0	11	0.03	Apr	sum
20	0.07	12	0.01	1	0
21	0.01	13	0.15	2	0
22	0.34	14	0.05	3	0
23	0	15	0	4	0.41
24	0.02	16	0.04	5	0.44
25	0.14	17	0	6	0.44

Precipitation Data

7	0.96	29	0.15	19	0
8	0.04	30	0	20	0
9	0	2013	Precip. (in)	21	0.39
10	0.15	May	sum	22	0.21
11	0.09	1	0	23	0.08
12	0.18	2	0	24	0.02
13	0.31	3	0	25	0
14	0.06	4	0	26	0.08
15	0	5	0	27	0.2
16	0.07	6	0	28	0.01
17	0	7	0	29	0.17
18	0.18	8	0	30	0
19	0.67	9	0	31	0
20	0.01	10	0	2013	Precip. (in)
21	0.03	11	0	Jun	sum
22	0	12	0.08	1	0
23	0	13	0.11	2	0
24	0	14	0	3	0
25	0	15	0.03	4	0
26	0	16	0	5	0
27	0	17	0.02	6	0
28	0.08	18	0	7	0

Precipitation Data

8	0	30	0	20	0
9	0	2013	Precip. (in)	21	0
10	0	Jul	sum	22	0
11	0	1	0	23	0
12	0	2	0	24	0
13	0	3	0	25	0
14	0	4	0	26	0
15	0	5	0	27	0
16	0	6	0	28	0
17	0	7	0	29	0
18	0	8	0	30	0
19	0	9	0	31	0
20	0	10	0	2013	Precip. (in)
21	0.01	11	0	Aug	sum
22	0	12	0	1	0
23	0	13	0	2	0
24	0.01	14	0	3	0
25	0.01	15	0	4	0
26	0.56	16	0	5	0
27	0.13	17	0	6	0
28	0	18	0	7	0
29	0	19	0	8	0

Precipitation Data

9	0	31	0	20	0.15
10	0	2013	Precip. (in)	21	0.01
11	0	Sep	sum	22	0.37
12	0	1	0	23	0.08
13	0	2	0	24	0.01
14	0	3	0.12	25	0.04
15	0	4	0	26	0.01
16	0	5	0.46	27	0.05
17	0	6	1.08	28	1.21
18	0	7	0	29	0.62
19	0	8	0.01	30	0.63
20	0	9	0	2013	Precip. (in)
21	0	10	0	Oct	sum
22	0	11	0	1	0.08
23	0	12	0	2	0.19
24	0	13	0	3	0.02
25	0	14	0	4	0.01
26	0	15	0.21	5	0
27	0	16	0	6	0.04
28	0	17	0	7	0.1
29	0.38	18	0	8	0.39
30	0	19	0	9	0

Precipitation Data

10	0.03	2013	Precip. (in)	21	0
11	0.53	Nov	sum	22	0
12	0.06	1	0	23	0.08
13	0	2	0.38	24	0
14	0.01	3	0.02	25	0
15	0	4	0.01	26	0
16	0	5	0.05	27	0
17	0.01	6	0.09	28	0
18	0	7	0.94	29	0.01
19	0	8	0	30	0.06
20	0	9	0.09	2013	Precip. (in)
21	0	10	0	Dec	sum
22	0	11	0	1	0.03
23	0.01	12	0.14	2	0.11
24	0.01	13	0	3	0.01
25	0	14	0.01	4	0
26	0.01	15	0.08	5	0
27	0.06	16	0	6	0
28	0	17	0.05	7	0
29	0	18	0.8	8	0
30	0.01	19	0.11	9	0
31	0.01	20	0	10	0

Precipitation Data

11	0	Jan	sum	22	0
12	0.22	1	0.01	23	0
13	0.01	2	0.53	24	0
14	0	3	0.03	25	0
15	0.03	4	0	26	0
16	0	5	0	27	0
17	0	6	0	28	0.35
18	0.04	7	0.34	29	0.77
19	0	8	0.44	30	0.01
20	0.1	9	0.09	31	0.03
21	0.22	10	0.15	2014	Precip. (in)
22	0.21	11	0.91	Feb	sum
23	0.01	12	0.02	1	0.02
24	0	13	0.01	2	0
25	0	14	0	3	0
26	0	15	0	4	0
27	0.03	16	0	5	0
28	0	17	0	6	0
29	0	18	0	7	0
30	0.02	19	0	8	0.09
31	0.01	20	0	9	0.01
2014	Precip. (in)	21	0	10	0.54

Precipitation Data

11	0.75	3	0.37	25	0.22
12	0.14	4	0.41	26	0.06
13	0	5	1.44	27	0.03
14	0.41	6	0.21	28	0.51
15	0.51	7	0	29	0.63
16	1.41	8	1.12	30	0.02
17	0.44	9	0.26	31	0
18	0.62	10	0.44	2014	Precip. (in)
19	0.02	11	0	Apr	sum
20	0.03	12	0	1	0
21	0.23	13	0	2	0
22	0.09	14	0.11	3	0.11
23	0.18	15	0.2	4	0
24	0.39	16	1.09	5	0.08
25	0	17	0.01	6	0
26	0	18	0.01	7	0
27	0	19	0	8	0.37
28	0	20	0	9	0.01
2014	Precip. (in)	21	0	10	0
Mar	sum	22	0	11	0
1	0.01	23	0	12	0
2	0.7	24	0	13	0

Precipitation Data

14	0	4	0.26	26	0.01
15	0.01	5	0.24	27	0
16	0.41	6	0	28	0.03
17	0.7	7	0	29	0
18	0	8	0.32	30	0
19	0.36	9	0.07	31	0
20	0	10	0	2014	Precip. (in)
21	0.14	11	0.01	Jun	sum
22	0.53	12	0	1	0
23	0.22	13	0	2	0
24	0.3	14	0	3	0
25	0.05	15	0	4	0
26	0.18	16	0	5	0
27	0	17	0	6	0
28	0	18	0.04	7	0
29	0	19	0	8	0
30	0	20	0	9	0
2014	Precip. (in)	21	0	10	0
May	sum	22	0	11	0
1	0	23	0.16	12	0
2	0	24	0	13	0.03
3	1.19	25	0.27	14	0

Precipitation Data

15	0.01	5	0	27	0
16	0.11	6	0	28	0
17	0.05	7	0	29	0
18	0	8	0	30	0
19	0	9	0	31	0
20	0	10	0	2014	Precip. (in)
21	0	11	0	Aug	sum
22	0	12	0	1	0
23	0	13	0	2	0
24	0	14	0	3	0
25	0	15	0	4	0
26	0	16	0	5	0
27	0	17	0	6	0
28	0	18	0	7	0
29	0	19	0	8	0
30	0	20	0	9	0
2014	Precip. (in)	21	0	10	0
Jul	sum	22	0	11	0
1	0	23	0	12	0
2	0	24	0	13	0
3	0	25	0	14	0
4	0	26	0	15	0

Precipitation Data

16	0	5	0	27	0
17	0	6	0	28	0
18	0	7	0	29	0
19	0	8	0	30	0
20	0	9	0	2014	Precip. (in)
21	0	10	0	Oct	sum
22	0	11	0	1	0
23	0	12	0	2	0
24	0	13	0	3	0
25	0	14	0	4	0
26	0	15	0	5	0
27	0	16	0	6	0
28	0	17	0	7	0
29	0	18	0	8	0
30	0	19	0	9	0
31	0	20	0	10	0
2014	Precip. (in)	21	0	11	0
Sep	sum	22	0	12	0
1	0	23	0	13	0
2	0	24	0.66	14	0.11
3	0	25	0.27	15	0.45
4	0	26	0.09	16	0

Precipitation Data

17	0.14	6	0.22	28	1.39
18	0.31	7	0	29	0.06
19	0	8	0	30	0
20	0.44	9	0.29	2014	Precip. (in)
21	0.1	10	0	Dec	sum
22	1.43	11	0	1	0
23	0.35	12	0	2	0
24	0.13	13	0	3	0
25	0.37	14	0	4	0.05
26	0.05	15	0	5	0.09
27	0.01	16	0	6	0.25
28	0.34	17	0	7	0
29	0.04	18	0	8	0.45
30	0.67	19	0	9	0.42
31	0.77	20	0.11	10	0.5
2014	Precip. (in)	21	0.67	11	0.33
Nov	sum	22	0.03	12	0
1	0	23	0.42	13	0.01
2	0.11	24	0.01	14	0
3	0.24	25	0.33	15	0
4	0.05	26	0.01	16	0
5	0.27	27	0.04	17	0.16

Precipitation Data

18	0.6	7	0	29	0
19	0.13	8	0	30	0
20	0.6	9	0.01	31	0
21	0	10	0.18	2015	Precip. (in)
22	0	11	0.06	Feb	sum
23	0.61	12	0	1	0.04
24	0.12	13	0	2	0.3
25	0	14	0	3	0.03
26	0	15	0.43	4	0.3
27	0.12	16	0	5	0.87
28	0.06	17	0.76	6	0.75
29	0	18	0.23	7	0.82
30	0	19	0.03	8	0.15
31	0	20	0	9	0.15
2015	Precip. (in)	21	0	10	0.02
Jan	sum	22	0.03	11	0
1	0	23	0.08	12	0.02
2	0.03	24	0.02	13	0
3	0	25	0.01	14	0.05
4	0.22	26	0	15	0
5	0.07	27	0.02	16	0
6	0.01	28	0	17	0

Precipitation Data

18	0	10	0	2015	Precip. (in)
19	0.03	11	0.09	Apr	sum
20	0.02	12	0	1	0.05
21	0	13	0.04	2	0
22	0	14	0.54	3	0.05
23	0	15	2.2	4	0
24	0	16	0	5	0
25	0.07	17	0.03	6	0
26	0.22	18	0	7	0.01
27	0.73	19	0.01	8	0
28	0	20	0.12	9	0
2015	Precip. (in)	21	0.13	10	0.52
Mar	sum	22	0.07	11	0.02
1	0	23	0.2	12	0
2	0	24	0.27	13	0.46
3	0	25	0.15	14	0.05
4	0	26	0	15	0
5	0	27	0.01	16	0
6	0	28	0	17	0
7	0	29	0	18	0
8	0	30	0.02	19	0
9	0	31	0.31	20	0

Precipitation Data

21	0.16	11	0	Jun	sum
22	0	12	0.11	1	0.09
23	0.1	13	0.14	2	0
24	0.15	14	0	3	0
25	0.01	15	0.01	4	0
26	0	16	0	5	0
27	0	17	0	6	0
28	0.11	18	0	7	0
29	0.01	19	0	8	0
30	0	20	0	9	0
2015	Precip. (in)	21	0	10	0
May	sum	22	0	11	0
1	0	23	0	12	0
2	0	24	0	13	0
3	0	25	0	14	0
4	0	26	0	15	0
5	0.18	27	0	16	0
6	0	28	0	17	0
7	0	29	0	18	0
8	0	30	0	19	0.07
9	0	31	0	20	0
10	0	2015	Precip. (in)	21	0

Precipitation Data

22	0	12	0	1	0
23	0	13	0	2	0
24	0	14	0	3	0
25	0	15	0	4	0
26	0	16	0	5	0
27	0	17	0	6	0
28	0	18	0	7	0
29	0.01	19	0	8	0
30	0	20	0	9	0
2015	Precip. (in)	21	0.13	10	0
Jul	sum	22	0	11	0
1	0	23	0	12	0.04
2	0	24	0.01	13	0
3	0	25	0.02	14	0.57
4	0	26	0.1	15	0
5	0	27	0.01	16	0
6	0	28	0	17	0
7	0	29	0	18	0
8	0	30	0	19	0
9	0	31	0	20	0
10	0	2015	Precip. (in)	21	0
11	0	Aug	sum	22	0

Precipitation Data

23	0	12	0	2	0
24	0	13	0.03	3	0
25	0	14	0	4	0
26	0	15	0	5	0
27	0	16	0.04	6	0.01
28	0.01	17	0.58	7	0.38
29	0.18	18	0.01	8	0
30	0.24	19	0	9	0.01
31	0.06	20	0.09	10	0.77
2015	Precip. (in)	21	0	11	0
Sep	sum	22	0	12	0.34
1	0.17	23	0	13	0.07
2	0.02	24	0	14	0
3	0	25	0.03	15	0
4	0	26	0	16	0.01
5	0.06	27	0	17	0.04
6	0.19	28	0	18	0.16
7	0	29	0	19	0
8	0	30	0	20	0
9	0	2015	Precip. (in)	21	0
10	0.01	Oct	sum	22	0.01
11	0	1	0.01	23	0

Precipitation Data

24	0.01	13	1.31	3	0.52
25	0.35	14	1.64	4	0.12
26	0.09	15	0.75	5	0.81
27	0.01	16	0.09	6	0.55
28	0.1	17	0.74	7	1.06
29	0.02	18	0.03	8	1.51
30	0.36	19	0.08	9	0.56
31	0.99	20	0	10	0.63
2015	Precip. (in)	21	0	11	0.01
Nov	sum	22	0	12	0.56
1	0.5	23	0.12	13	0.11
2	0.07	24	0.21	14	0
3	0.07	25	0	15	0.02
4	0	26	0	16	0.13
5	0.01	27	0	17	0.82
6	0.01	28	0	18	0.54
7	0.49	29	0	19	0.01
8	0.38	30	0.01	20	0.19
9	0.16	2015	Precip. (in)	21	0.83
10	0.06	Dec	sum	22	0.12
11	0.05	1	0.39	23	0.09
12	0.24	2	0.06	24	0.11

Precipitation Data

25	0.05	14	0	3	0.48
26	0	15	0.04	4	0.05
27	0.32	16	0.41	5	0.15
28	0.03	17	0.32	6	0
29	0	18	0.05	7	0
30	0	19	0.46	8	0
31	0	20	0.2	9	0
2016	Precip. (in)	21	1.27	10	0.16
Jan	sum	22	0.27	11	0.37
1	0	23	0.53	12	0.86
2	0	24	0	13	0.36
3	0.01	25	0	14	0
4	0.07	26	0.27	15	0.12
5	0.11	27	0.8	16	0.01
6	0	28	0.52	17	0.46
7	0	29	0.18	18	0.12
8	0	30	0.02	19	0.49
9	0	31	0	20	0
10	0	2016	Precip. (in)	21	0.07
11	0.09	Feb	sum	22	0.01
12	0.52	1	0.25	23	0
13	0.57	2	0.02	24	0.02

Precipitation Data

25	0	16	0	5	0
26	0.15	17	0	6	0
27	0.08	18	0	7	0
28	0.68	19	0	8	0
29	0.12	20	0.08	9	0
2016	Precip. (in)	21	0.28	10	0
Mar	sum	22	0.01	11	0
1	0.71	23	0.13	12	0.44
2	0.27	24	0	13	0
3	0.03	25	0	14	0.2
4	0.21	26	0.04	15	0
5	0.2	27	0.48	16	0
6	0.39	28	0	17	0
7	0.26	29	0	18	0
8	0.03	30	0	19	0
9	0.97	31	0	20	0
10	0.32	2016	Precip. (in)	21	0
11	0.35	Apr	sum	22	0.02
12	0.2	1	0	23	0.02
13	0.52	2	0	24	0.27
14	0.06	3	0.12	25	0.1
15	0	4	0.17	26	0

Precipitation Data

27	0	17	0	6	0
28	0	18	0	7	0
29	0.04	19	0.22	8	0
30	0	20	0	9	0.06
2016	Precip. (in)	21	0.04	10	0.01
May	sum	22	0	11	0.1
1	0	23	0	12	0
2	0	24	0	13	0
3	0	25	0	14	0.05
4	0	26	0	15	0
5	0	27	0.02	16	0
6	0	28	0.03	17	0.22
7	0	29	0	18	0.16
8	0.02	30	0	19	0
9	0	31	0	20	0.29
10	0	2016	Precip. (in)	21	0.34
11	0	Jun	sum	22	0
12	0	1	0	23	0.34
13	0	2	0	24	0.09
14	0	3	0	25	0
15	0	4	0	26	0
16	0	5	0	27	0

Precipitation Data

28	0	18	0	7	0.03
29	0	19	0	8	0
30	0	20	0	9	0
2016	Precip. (in)	21	0	10	0
Jul	sum	22	0.21	11	0
1	0	23	0	12	0
2	0	24	0	13	0
3	0	25	0	14	0
4	0	26	0	15	0
5	0	27	0	16	0
6	0	28	0	17	0
7	0.06	29	0	18	0
8	0.14	30	0	19	0
9	0.07	31	0	20	0
10	0	2016	Precip. (in)	21	0
11	0	Aug	sum	22	0
12	0	1	0	23	0
13	0	2	0	24	0
14	0	3	0	25	0
15	0	4	0	26	0
16	0	5	0	27	0
17	0	6	0	28	0

Precipitation Data

29	0	18	0	8	0.59
30	0	19	0.01	9	0.27
31	0	20	0	10	0
2016	Precip. (in)	21	0	11	0
Sep	sum	22	0	12	0
1	0	23	0	13	1.62
2	0	24	0	14	1.46
3	0	25	0	15	0.84
4	0	26	0	16	0.51
5	0	27	0	17	0.04
6	0	28	0	18	0.13
7	0.02	29	0	19	0.16
8	0	30	0	20	1.19
9	0	2016	Precip. (in)	21	0.01
10	0	Oct	sum	22	0.01
11	0	1	0.1	23	0.14
12	0	2	0	24	0.13
13	0	3	0.01	25	0.02
14	0	4	0.1	26	1.46
15	0	5	0.04	27	0.07
16	0	6	0.26	28	0.01
17	0.09	7	0.16	29	0.17

Precipitation Data

30	0.22	19	0.09	9	0.29
31	0.58	20	0.11	10	0.21
2016	Precip. (in)	21	0.03	11	0.06
Nov	sum	22	0.52	12	0.02
1	0.3	23	0.26	13	0
2	0.45	24	1.16	14	0
3	0.03	25	0.04	15	0
4	0	26	0.52	16	0
5	0.94	27	0.42	17	0
6	0.21	28	0	18	0
7	0.05	29	0.05	19	0.48
8	0	30	0.2	20	0.01
9	0.19	2016	Precip. (in)	21	0
10	0	Dec	sum	22	0.36
11	0	1	0	23	0.61
12	0.06	2	0.2	24	0
13	0.25	3	0.06	25	0
14	0.21	4	0.17	26	0.39
15	0.97	5	0.23	27	0
16	0	6	0	28	0
17	0	7	0	29	0.12
18	0	8	0.04	30	0.07

Precipitation Data

31	0	20	0	9	1.57
2017	Precip. (in)	21	0.04	10	0.06
Jan	sum	22	0.12	11	0.01
1	0.16	23	0	12	0
2	0	24	0	13	0
3	0	25	0	14	0.22
4	0	26	0	15	1.62
5	0	27	0	16	0.46
6	0	28	0	17	0
7	0	29	0	18	0.13
8	0.56	30	0	19	0.12
9	0.06	31	0.01	20	0.2
10	0.1	2017	Precip. (in)	21	0.22
11	0	Feb	sum	22	0.01
12	0	1	0	23	0.03
13	0	2	0	24	0
14	0	3	0.65	25	0
15	0	4	0.71	26	0.26
16	0	5	0.68	27	0.46
17	1.52	6	0.4	28	0
18	1.21	7	0	2017	Precip. (in)
19	0.13	8	0.74	Mar	sum

Precipitation Data

1	0	23	0.18	12	0.83
2	0.07	24	0.52	13	0.18
3	0.59	25	0.01	14	0.02
4	0.03	26	0.31	15	0
5	0.11	27	0.06	16	0
6	0	28	0.07	17	0.06
7	0.46	29	0.44	18	0.22
8	0.03	30	0.01	19	0.36
9	0.53	31	0	20	0.02
10	0.02	2017	Precip. (in)	21	0
11	0.28	Apr	sum	22	0.13
12	0.02	1	0.04	23	0.21
13	0.51	2	0.07	24	0.02
14	0.35	3	0	25	0.01
15	0.72	4	0.07	26	0.04
16	0	5	0.53	27	0.02
17	0.76	6	0.27	28	0.06
18	0.48	7	0.35	29	0.06
19	0	8	0.08	30	0.05
20	0	9	0	2017	Precip. (in)
21	0.17	10	0.36	May	sum
22	0	11	0	1	0.07

Precipitation Data

2	0.09	24	0	13	0
3	0.23	25	0	14	0
4	0.27	26	0	15	0.9
5	0.18	27	0	16	0
6	0.44	28	0	17	0
7	0	29	0	18	0.01
8	0	30	0	19	0
9	0	31	0.03	20	0
10	0	2017	Precip. (in)	21	0
11	0.38	Jun	sum	22	0
12	0.18	1	0.02	23	0
13	0.09	2	0	24	0
14	0.01	3	0	25	0
15	0.28	4	0	26	0
16	0.14	5	0	27	0
17	0	6	0	28	0
18	0	7	0	29	0
19	0	8	0.29	30	0
20	0	9	0	2017	Precip. (in)
21	0	10	0	Jul	sum
22	0	11	0	1	0
23	0	12	0	2	0

Precipitation Data

3	0	25	0	14	0
4	0	26	0	15	0
5	0	27	0	16	0
6	0	28	0	17	0
7	0	29	0	18	0
8	0	30	0	19	0
9	0	31	0	20	0
10	0	2017	Precip. (in)	21	0
11	0	Aug	sum	22	0
12	0	1	0	23	0
13	0	2	0	24	0
14	0	3	0	25	0
15	0	4	0	26	0
16	0	5	0	27	0
17	0	6	0	28	0
18	0	7	0	29	0
19	0	8	0	30	0
20	0	9	0	31	0
21	0	10	0	2017	Precip. (in)
22	0	11	0	Sep	sum
23	0	12	0	1	0
24	0	13	0.02	2	0

Precipitation Data

3	0	25	0.02	15	0
4	0	26	0	16	0
5	0	27	0	17	0.05
6	0	28	0	18	0.94
7	0	29	0.04	19	0.46
8	0	30	0.03	20	0.11
9	0	2017	Precip. (in)	21	0.17
10	0	Oct	sum	22	0.06
11	0	1	0	23	0
12	0	2	0	24	0
13	0	3	0	25	0
14	0	4	0	26	0
15	0	5	0	27	0
16	0	6	0	28	0
17	0.06	7	0.07	29	0
18	0.11	8	0	30	0
19	0.29	9	0	31	0
20	0.04	10	0.01	2017	Precip. (in)
21	0	11	0	Nov	sum
22	0	12	0.13	1	0
23	0	13	0.02	2	0.07
24	0	14	0	3	0

Precipitation Data

4	0.01	26	0.19	16	0.1
5	0	27	0	17	0.01
6	0	28	0.57	18	0.68
7	0	29	0.01	19	1.15
8	0.11	30	0.26	20	0.07
9	0.27	2017	Precip. (in)	21	0
10	0	Dec	sum	22	0.06
11	0.13	1	0.21	23	0
12	0.57	2	0.61	24	0.11
13	0.4	3	0.04	25	0.07
14	0.07	4	0	26	0
15	0.64	5	0	27	0
16	0.08	6	0	28	0.09
17	0	7	0	29	1.37
18	0	8	0	30	0.08
19	0.38	9	0	31	0
20	0.49	10	0	2018	Precip. (in)
21	1.26	11	0	Jan	sum
22	0.56	12	0	1	0
23	0.1	13	0	2	0
24	0	14	0	3	0
25	0.22	15	0.02	4	0.13

Precipitation Data

5	0.39	27	0.55
6	0.23	28	0.04
7	0.4	29	0.89
8	0.1	30	0
9	0.3	31	0
10	0.09	2018	Precip. (in)
11	0.88	Feb	sum
12	0.1	1	0.57
13	0	2	0.02
14	0	3	0.11
15	0.07	4	0.02
16	0.18	5	0
17	0.38	6	0
18	0.67		
19	0.02		
20	0.05		
21	0.22		
22	0.14		
23	0.8		
24	0.39		
25	0.12		
26	0.18		